(b) processing the collected information;

(c) transferring the processed information continuously to a database associated with a routing processor adapted for intercepting and routing incoming calls;

(d) receiving incoming IPNT call at the routing processor;

(e) retrieving the processed information from the database; and

(f) selecting a destination for the call based on the processed information retrieved.

REMARKS

The present amendment is responsive to the Office Action mailed in the above-referenced case on November 30, 1998. In the Office Action claims 1-15 are presented for examination. Claims 1-5 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kubler et al (USP 5,726,984) hereinafter Kubler, in view of Chin (USP 5,825,775) hereinafter Chin. Claims 11-13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kubler in view of Otto. Further claims 6-10 are rejected under 35 U.S.C. 103(a) as being unpatentable over Kubler in view of Otto and further in view of Arango (USP 5,732,078).

Applicant has studied the prior art provided by the Examiner in detail, and the Examiner's remarks in rejection of the claims. In response, the applicant has Applicant has herein amended some of the claims standing for examination to more particularly point out and distinctly claim the subject matter regarded as the invention, and to distinguish unarguably over the references cited and applied.

Claim 1 as amended herein recites:

1. A computerized Internet Protocol Network Telephony (IPNT) call center, comprising:

a first processor coupled to a wide area network (WAN) and adapted to receive and distribute IPNT calls; and

a plurality of computers at operator workstations, each computer having a video display (PC/VDU) coupled to the processor;

wherein the processor is adapted to monitor [transactional] activity of the call center, on a transaction by transaction basis, to process the activity information according to selected routines in the processor, and to continuously communicate the processed information to a second processor elsewhere in the WAN.

The Examiner has rejected claim 1 under 103(a) using Kubler in view of Chin. The Examiner states that Kubler provides a system comprising a first processor connected to a WAN and a second processor also connected to the WAN. The Examiner presents the art of Chin to teach the specific part of applicant's claim 1 in which a router/hub (processor) monitors, processes and routes activity information to a second processor elsewhere in the WAN. The Examiner states that the mechanism of Chin facilitates and enhances network management by enabling remote network monitoring of routers. Thus it would have been obvious to apply Chin's capability of monitoring, processing and routing activity information to a second processor by a router in Kubler's system

with the motivation being to facilitate network management by enabling remote network monitoring routers.

Applicant has made amendments to claim one to more clearly point out the ability to monitor the activity of the call center on a transaction by transaction basis, and to continually transmit the monitored, processed information to another processor on the WAN.

Applicant does not believe one of ordinary skill in the art would incorporate the system of Chin to accomplish applicant's claim 1. Chin clearly teaches that the management system **108** gathers traffic information from router/hub **106** and displays the information on display **142** responsive to input entered through operation of keyboard **144** and/or mouse **146** (col.7, lines 1-6). Information is only transmitted to the management station when a user enters a command to do so (col. 7, lines 10-12, and col. 8, lines 15-19).

Applicant's claim 1 as amended discloses an ability to monitor the call center on a transaction by transaction basis, continually transmitting the information to another processor (page 25, line 26 thru page 26, line 5). Applicant's system must have a clear picture of the status of the call center in order to accurately and efficiently route calls. Accessing real time information is a very critical aspect of applicant's invention. Actual call volume and agent status can change drastically in a short period of time. Many variables can change, within just a few seconds, which greatly affects the ability to accurately route calls to available agents capable of handling the call. In a call-center system having hundreds of agents, for example, which is common, thousands of calls may be handled each minute.

Chin's system collects information at the router/hub on demand from a user in order to detect whether a user has performed unauthorized file transfers or is otherwise using the network in an unauthorized manor. Chin's method and purpose for collecting information from the router/hub

clearly teaches away from applicant's invention and fails to support a 103 rejection. The processor in chin is unable to monitor activity on a transaction by transaction basis, continually sending the information to another processor on the WAN.

Applicant has amended claim 1 to overcome the prior art presented by the Examiner, therefore claim 1 is now patentable. Claims 2-5 are now patentable at least as depended from a patentable claim.

Claim 6 as amended now recites:

6. An Internet Protocol Network Telephony (IPNT) call-routing system, comprising:

an initial call-processing system adapted for receiving IPNT calls from customers over a wide area network (WAN), and including a first processor adapted for routing incoming IPNT calls to selected destinations; and

a call center remote from the call-processing system, the call center comprising a second processor coupled to a plurality of computer platforms at operator workstations and adapted to route IPNT calls to individual ones of the computer platforms, and also connected to WAN;

wherein the second processor is adapted to monitor activity of the call center on a transaction by transaction basis, to process the activity information according to selected routines, and to continuously communicate the processed activity information to the first processor over the WAN, and wherein the first processor uses the processed activity information to select destinations to route the incoming IPNT calls.

The Examiner has rejected claim 6 under §103 stating Kubler teaches the ability to receive IPNT calls over a WAN including a first processor for routing the IPNT calls to selected destinations, including a second processor. However Kubler fails to show a second processor capable of monitoring , processing and communicating activity information of a remote call center to the first processor. The first processor using the information in selecting destinations for the incoming IPNT calls. The Examiner states that Otto teaches that an initial call center which selects a destination for routing calls based on information about transactions at remote call centers. Specifically a call center only routes a call to a call center destination if the call center does not have too many calls.

Applicant has herein amended claim 6 to add similar limitations as in claim 1 to clearly show that the second processor not only routes IPNT calls to individual ones of computer platforms at operator workstations but monitors activity of the call center on a transaction by transaction basis, and continuously sends the information to the first processor.

Fig. **1** of Otto shows an ACD served by a switching system **1** comprising a team of positions **20**, the **A** team is one of four teams of positions serving a particular customer. Two other teams, **B**, and **C**, are connected via the public switched network **30** to switch **1**. Switch **1** in mother node **A** controls incoming calls for team **A** and overflow calls from teams **B** and **C** in addition to calls rerouted by switch **1** and rejected by team **B** and Team **C**. Call center **D** is a foreign node and requires separate queues for routing **17**, **18** and **19**. If a call intended for the **A** team is received at switch **1**, it is examined with processor **2** comprising main queue**10**, the **B** overflow queue **11**, and the **C** overflow queue **12**. If the call can be served by the **A** team it is placed in the main queue **10**. If not, the call is rerouted to an ACD serving center of either the **B** or **C** team positions (col. 4 lines 27-30, and 47-51).

More specifically when the system of Otto receives a call at a switch for serving an ACD. Test **203** is used to determine whether the delay in processing the call equals or exceeds a predetermined parameter. If not then the call is placed in the main queue. If the delay is excessive then the loop of tests **207** and **209** is entered. In this loop, test **207** determines if there is an alternate site that has not yet been tested as a possible candidate for handling the call. Test **209** is used to determine whether the number of calls in an overflow queue for that site equals or exceeds a queue parameter. If not test **207** is reentered. If a given alternate site being tested has no more than X calls in it's queue, then the incoming call is routed to that alternative site (col. 6, lines 31-50). Otto does disclose a management information system (MIS) attached to call center A to provide information about the load applied to and the service provided by call center A.

Otto clearly fails to disclose a second processor monitoring activity of a call center on a transaction by transaction basis, continually sending the processed information to a first processor adapted to route IPNT calls to the first processor over the WAN, and wherein the first processor uses the processed activity information to select destinations to route the incoming IPNT calls. Otto is very limited to only checking queue information stored in memory **3** in Figure **1**. Otto does not route calls based on transactional information at the call center, as claimed in applicant's invention. Otto routes calls based only on information limited to number of calls in a queue.

Applicant's system routes calls based on real time reported transactional activity of a call center. Accessing real time information is a very critical aspect of applicant's invention. Actual call volume and agent status etc. can change drastically in a short amount of time. In Applicant's invention IPNT call routing is accomplished by providing a first processor receiving information from a second processor connected to the telephony

switching apparatus at a call center. The second processor provides information on the switch status of a call center, on a transaction-by-transaction basis, to the first processor over the WAN, and wherein the first processor uses the processed transactional activity information to select destinations to route the incoming IPNT calls. Transactional activity provides a much wider scope of information than merely call volume in a queue. In Applicant's invention real time information is provided on a transaction by transaction basis.

Applicant believes Otto is not capable of providing the kind of monitoring and communication of information needed to accomplish applicant's invention as claimed. Applicant respectfully requests the art of Otto be withdrawn as applied in the 103 rejection of applicant's claim 6. Claim 6 with the art of Otto withdrawn is now patentable. Claims 7-10 are now patentable at least as depended from a patentable claim.

Claim 11 as amended now recites:

11. An Internet Protocol Network Telephony (IPNT) call processing system adapted for routing incoming calls to computer platforms at operator workstations, comprising:

an Internet routing server adapted to route IPNT calls; and

a database connected to the Internet server adapted for receiving and storing processed information about transactions at remote IPNT call centers continually on a transaction by transaction basis;

wherein the Internet routing server is adapted to select final destinations at the operator workstation computer platforms based on the stored processed information about transactions at the remote IPNT call centers.

Claim 11 is rejected by the Examiner under 103 over Kubler in view of Otto. The Examiner states that Otto teaches that a call center selects a destination for routing calls based on information about transactions at remote call centers, where the call centers do not have too many calls in a queue. The Examiner also states Otto teaches a MIS **15** (database) at the call center for collecting, processing and sending information regarding loads of the call center to other MIS' in other call centers. Column 5 clearly states that information provided by the MIS' are monitored by sending data packages periodically. A system administrator accesses the data from the MIS and controls the parameter 13 based on the information provided by the MIS. The MIS is not sending information to a database connected to an Internet server adapted for receiving and storing processed information about transactions at remote IPNT call centers continually on a transaction by transaction basis, wherein, the Internet routing server is adapted to select final destinations at the operator workstation computer platforms based on the stored processed information about transactions at the remote IPNT call centers. The administrator only sets parameters, not routing individual calls.

Applicant respectfully requests that Otto be withdrawn as applied to the 103 rejection, as the applicant has successfully shown that Otto fails to support the rejection as applied to claim 11. Claim 12 is now patentable at least as depended from a patentable claim.

Claim 13 as amended now recites:

13. A method for routing an incoming IPNT call to a selected destination, comprising steps of:

(a) collecting information from a switch at an IPNT call center via a processor connected to the switch on a transaction by transaction basis [regarding operations of the call center];

(b) processing the collected information;

(c) transferring the processed information continuously to a database associated with a routing processor adapted for intercepting and routing incoming calls;

(d) receiving incoming IPNT call at the routing processor;

(e) retrieving the processed information from the database; and

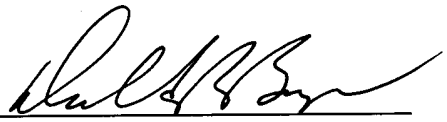
(f) selecting a destination for the call based on the processed information retrieved.

Claim 13 has been rejected by the Examiner using the same reasoning set forth on behalf of claim 11. Claim 13 being the method claim of claim 11, applicant has made similar amendments to claim 13 to show the switch at the call center being monitored on a transaction by transaction basis, and the processor sending the information continuously to the call processor to accurately route calls based on transactional activity of the switch. Claim 13 is patentable as argued on behalf of claim 11 above with the art of Otto withdrawn.

As all of the claims as amended are clearly shown to be patentable over the art of record, Applicant respectfully requests that the rejections be withdrawn and that the case be passed quickly to issue.

If any fees are due beyond fees paid with this amendment, authorization is made to deduct those fees from deposit account 50-0534. If any time extension is needed beyond any extension requested with this amendment, such extension is hereby requested.

Respectfully Submitted,
Alec Miloslavsky

by 

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